

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: APPLICATION OF VENEQUIP, S.A. §
Applicant, §
§ Civil Action No. 4:21-mc-02391
v. §
§
§
§
§
MUSTANG MACHINERY COMPANY, LLC §
d/b/a MUSTANG CAT §
Respondent. §

**JOINT STIPULATION REGARDING DEADLINE FOR RESPONSE TO
OBJECTION TO APPLICATION FOR ORDER PURSUANT TO 18 USC §1782(a)
PERMITTING VENEQUIP, S.A. TO ISSUE SUBPOENAS FOR THE TAKING OF
DEPOSITIONS AND THE PRODUCTION OF DOCUMENTS
FROM MUSTANG MACHINERY COMPANY, LLC D/B/A MUSTANG CAT
FOR USE IN SWISS PROCEEDING**

Applicant Venequip, S.A. (“Applicant”) and Respondent Mustang Machinery Company LLC (“Respondent”) hereby stipulate and agree to an extension of time for Applicant to respond to the Objection to Application For Order Pursuant To 18 USC §1782(a) Permitting Venequip, S.A. to Issue Subpoenas for the Taking of Depositions and the Production of Documents From Mustang Machinery Company, LLC D/B/A Mustang Cat For Use In Swiss Proceeding (Dkt. 6) to **December 17, 2021.** This is the first stipulation to extend this deadline agreed to by the parties. This extension will not prejudice either party or impact the Application. This extension is for good cause and brought in good faith, not for purposes of delay.

Dated: December 9, 2021

Agreed to by:

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Counsel for Respondent

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served on all counsel of record pursuant to the Federal Rules of Civil Procedure on December 9, 2021.

/s/ Roland Garcia
Roland Garcia